

School Administrative Unit ♦ Fifty-Nine

Office of Technology ♦ Kevin Sousa, Director

5 Elm Street, Northfield, New Hampshire 03276 ♦ 603.286.4332 fax 603.286.2153

ksousa@wrsdsau59.org

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February 21, 2001

FEB 26 2001

Federal Communications Commission
Office of the Secretary
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

FCC MAIL ROOM

In the matter of: Request for Review by Winnisquam Regional School District of Decision of
Universal Service Administrator
Ref: CC Docket Nos. 96-45 and 97-21

Erate funding Year: 2000-2001
Funding Request Number: 393607
Application Number: 187927

To Whom It May Concern:

We have received an "Administrator's Decision of SPIN Change" notice (*Attachment A*) that denied our appeal to issue a new Funding Request Number that would allow a currently funded request split between two Service Providers. When we realized two companies were billing us separately I spoke with a representative at the SLD. They suggested that I simply write an appeal and request a second Funding Request Number (FRN). The appeal letter was sent on February 1, 2001 (*Attachment B*). When I received the denial notice (February 20, 2001) I again spoke with the SLD. They too were surprised at the outcome and suggested going to this next step.

Our original Form 471 application (*Attachment C*) requested \$14,316.48 representing a 54% discount on a total amount of \$26,512.00 for Internet Access. This request has been funded. The amount is reimbursement for our Internet Service Provider (ISP), The Destek Group, Inc. (SPIN 143004379). However, Verizon (New England Tel. & Tel. Co. NH) bills us separately for the Telecomm Service for our Internet access. Originally when filing our Form 471 it appeared that our ISP was to handle all the billing so the total amount was combined onto the one FRN and SPIN. Our appeal makes no change to the amount of money already committed through Erate. We asked for the possibility of issuing a second Funding Request Number that could be assigned to Verizon (SPIN 143001303). Therefore the current FRN 393607 would decrease from \$14,316.48 to \$8,262.00 and the new FRN and funding commitment for Verizon would be \$6,054.48 thus totaling the same already committed \$14,316.48.

The explanation of the denial states that the SLD is limited to the FRNs as listed in the original Form 471 and that changes could only be made "prior to the funding commitment process". Our request is being denied because it was not processed in the "pre-commitment phase". According to the reference area on the SLD web site, "In certain limited circumstances, the SLD will allow changes in products and/or services after fund commitment. The SLD will view these limited changes in products and/or services as minor

contract modifications. These changes may be required if a service provider is currently unable to provide some of the products and/or services indicated in a Form 471 because the products and/or services are no longer offered."

(<http://www.sl.universalservice.org/reference/ServiceChangesYR4.asp>)

The process was also broadened with the "New guidance for eligible SPIN changes: The Copan Decision" (<http://www.sl.universalservice.org/reference/SpinChangeYr4.asp>). It seems that in both cases it is possible for the SLD to change, add and/or eliminate FRNs after the pre-commitment phase.

We are asking the SLD to reconsider and provide another Funding Request Number for our account with Verizon (SPIN 143001303) that would allow us to request funding reimbursement already committed for the school district's Internet access. Our request is clerical in nature and should not in any way cause harm or possible question of the integrity of the Erate program in any part. Our school district has participated in the Erate program over the last two years and is indebted and grateful for the increased resources made available to our students and staff by this legislation and process.

Thank you very much for your time and consideration. If there is any need for further information, clarification or communication please be in contact with me.

Sincerely,



Kevin B. Sousa
Director of Technology



UNIVERSAL SERVICE
ADMINISTRATIVE CO.

Box 125 - Correspondence Unit
80 South Jefferson Road
Whippany, New Jersey 07981

Attachment A

SCHOOLS AND LIBRARIES DIVISION

COPY

Administrator's Decision on SPIN Change

February 12, 2001

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Kevin B. Sousa
School Administrative Unit 59
5 Elm Street
Northfield, NH 03276

Re: Application Number: 187927
 Funding Request Numbers: 393607
 Funding Year: 2000-2001

After thorough review and investigation of your letter seeking approval to change Service Provider Identification Number (SPIN) and service provider for the funding year listed above, the Schools and Libraries Division (SLD) of the Universal Service Administrative Company has made the following determination on each Funding Request Number that was included in your inquiry for the above referenced Application Number.

Funding Request Numbers: FRN's listed above
Decision on inquiry to change SPIN number and service provider: Denied

The following explanation is provided to inform you of the reason for our decision on these Funding Request Numbers.

Your request would require the SLD to split an existing Funding Request Number (FRN) into two or more FRNs. The SLD cannot accommodate your request because we are limited to the FRNs as listed in your original Form 471. The only way to change those FRNs is through the Receipt Acknowledgement Letter (RAL) correction process, which occurs prior to the funding commitment process.

Since your request was not processed in the pre-commitment phase, it is being denied.

We strongly encourage you to work with your service providers to seek a solution (such as shared billing) that will allow you to fully utilize the funding for which you were approved.

If you feel further examination of your application is in order, you may file an appeal with the Federal Communications Commission, Office of the Secretary, 445 12TH Street, S.W., Room TW-A325, Washington, DC 20554. Before preparing and submitting your appeal, please be sure to review the FCC rules concerning the filing of an appeal of an Administrator's Decision, which are posted to the SLD Web Site at <www.sl.universalservice.org>. The appeal must be filed with the FCC no later

than 30 days from the date of the issuance of this letter, in order for the appeal to be filed in a timely fashion.

Thank you for your continued patience and cooperation during the decision process.

Schools and Libraries Division
Universal Service Administrative Company

School Administrative Unit ♦ Fifty-Nine

Office of Technology ♦ Kevin Sousa, Director

5 Elm Street, Northfield, New Hampshire 03276 ♦ 603.286.4332 fax 603.286.2153

ksousa@wrsdsau59.org

COPY

February 1, 2001

Letter of Inquiry and Appeal (Corrected)

SLD

Letter 2 with CORRECTED FIGURES

P.O. Box 125 - Correspondence Unit

80 South Jefferson Road

Whippany, NJ 07981

RE: Correction of Letter of Inquiry sent January 31, 2001

Winnisquam Reg School District

Funding Year 3

Form 471 Application Number: 187927

Billed Entity Number: 121040

Funding Request Number: 393607

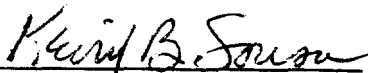
To Whom It May Concern:

In our Funding Commitment Decision Letter the above request is funded. The Pre-Discount Amount is \$26,512.00. The funding commitment decision is 54% for \$14,316.48. This total amount was put under one SPIN (143004379) and the funding request number 393607. In actuality we are being billed by two separate companies for our Internet Access so the cost above is split. One payment is to our ISP with the SPIN above and the second is Verizon (or New England Tel. & Tel. Co. NH) SPIN: 143001303 for the Internet Access Circuit.

Would it be possible for the SLD to divide these services and issue a separate Funding Request Number for the Verizon part of our bill? The total committed amount would not change. The current Funding Request Number 393607 would decrease from \$26,512.00 to \$15,300.00 @ 54% discount the Funding Commitment would be \$8,262.00. The new Funding Request Number would be in the amount \$11,212.00 for Verizon (New England Tel. & Tel. Co. NH) SPIN: 143001303 and @ 54% discount the Funding Commitment would be \$6,054.48. The total committed amount stays at \$14,316.48.

If it may be easier to process or help, we do have a Funding Request Number already for Verizon (New England Tel. & Tel. Co. NH) SPIN: 143001303 under Telecommunications Services in the amount of \$17,820.00. This FRN is 393937.

Sorry for any confusion with the last letter. Please contact me if there is any more information or paperwork that could help this process. Thank you very much for your time and consideration.



Kevin B. Sousa, Director of Technology

HOME CANCEL SAVE & EXIT HELP

FCC Form 471

Services Ordered and Certification Form



COPY

Applicant's Form Identifier: A
Contact Person: Kevin B. Sousa

Entity Number: 121040
Phone Number: (603) 286-4332

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FEB 26 2001

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FRN: 393607	11. Category of Service: INTERNET ACCESS	12. 470 application Number: 864390000281347
13. SPIN: 143004379	14. Service Provider Name: The Destek Group, Inc.	
15. Contract Number: N/A	16. Billing Account Number: N/A	17. Allowable Contract Date: 01/14/2000
18. Contract Award Date: 01/14/2000	19. Service Start Date: 07/01/2000	20. Contract Expiration Date: 06/30/2001
21. Attachment #: 1	22. Block 4 Worksheet No.: 186384	
23a. Monthly Charges: \$2,126.00	23b. Ineligible monthly amt.: \$0.00	23c. Eligible monthly amt.: \$2,126.00
23d. Number of months of service: 12	23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$25,512.00	
23f. One-time charges: \$1,000.00	23g. Ineligible one-time amt: \$0.00	
23h. Annual pre-discount amount for eligible one-time charges (23f - 23g): \$1,000.00		
23i. Total program year pre-discount amount (23e + 23h): \$26,512.00		23j. % discount (from Block 4): 54
23k. Funding Commitment Request (23i x 23j): \$14,316.48		

FRN: 393713	11. Category of Service: INTERNAL CONNECTIONS	12. 470 application Number: 864390000281347
13. SPIN: 143004379	14. Service Provider Name: The Destek Group, Inc.	
15. Contract Number: N/A	16. Billing Account Number: N/A	17. Allowable Contract Date: 01/14/2000
18. Contract Award Date: 01/14/2000	19. Service Start Date: 07/01/2000	20. Contract Expiration Date: 06/30/2001
21. Attachment #: 1	22. Block 4 Worksheet No.: 186384	
23a. Monthly Charges: \$0.00	23b. Ineligible monthly amt.: \$0.00	23c. Eligible monthly amt.: \$0.00
23d. Number of months of service: 12	23e. Annual pre-discount amount for eligible recurring charges (23c x 23d): \$0.00	
23f. One-time charges: \$51,948.00	23g. Ineligible one-time amt: \$0.00	
23h. Annual pre-discount amount for eligible one-time charges (23f - 23g): \$51,948.00		
23i. Total program year pre-discount amount (23e + 23h): \$51,948.00		23j. % discount (from Block 4): 54
23k. Funding Commitment Request (23i x 23j): \$28,051.92		